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By Hand

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Valerie Shore v. PaineWebber Long-Term Disability Plan*
No. 04 Civ. 4152 (DC)

Dear Judge Karas:

We are the attorneys for the plaintiff in the referenced ERISA long term disability benefits action. We write on behalf of all parties to request that your Honor dispense with a pre-motion conference for the parties' forthcoming motions for summary judgment and to set a briefing schedule for those motions.

As set forth in the parties Rule 26(f) report, all discovery was to be completed by October 8, 2004 and has been completed. ERISA long term disability cases are typically disposed of on summary judgment and a pre-motion conference will not assist in limiting issues to be resolved.

The parties propose the following briefing schedule:

1. Opening papers by January 11, 2005;
2. Opposition papers by February 8, 2005; and,
3. Reply papers by February 22, 2005.

Thank you for your Honor's attention to and consideration of this matter.

Respectfully submitted,
Rosen Preminger & Bloom LLP

By:

David S. Preminger

SO ORDERED

KENNETH M. KARAS

cc: Heather J. Holloway, Esq. by facsimile